

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Digital Audio Broadcasting Systems)	MM Docket No.99-325
And Their Impact On the Terrestrial)	
Radio Broadcast Service)	

**REPLY COMMENTS O F SUSQUEHANNA RADIO CO.
CONCERNING THE POTENTIAL OF AM IBOC.**

These reply comments are filed in response to the Public Notice DA 01-899 issued April 19, 2002 concerning the NRSC evaluation of the iBiquity Digital Corporation AM IBOC system. Susquehanna Radio Corp. is a privately held company that has served the public as a radio broadcast licensee for 60 years. Susquehanna owns and operates 12 AM and 20 FM stations.

Susquehanna has been a strong supporter of the In-Band/On-Channel (IBOC) concept since the idea was first conceived.¹ and hereby reaffirms its support for the NRSC recommendation that the iBiquity AM IBOC system “ should be authorized by the FCC as an enhancement to AM broadcasting in the US for day-time only service”. Susquehanna also supports iBiquity’s position that the Commission should allow AM broadcasters to commence digital operations immediately in order to meet their schedule for prompt introduction of this new technology.

¹ Susquehanna personnel were involved in the development of IBOC since the early 1990s and have been an active participant in the NRSC and all its IBOC working groups as well as the NAB Digital Task Force and have been a major supporter of the conclusions and recommendations of NRSC AM evaluation report.

In its comments in this proceeding, Clear Channel Communication, Inc. suggests that the Commission adopt a more conservative approach and “...*limit the primary digital carriers of AM stations during this interim period to 6 dB less than the power level used in the iBiquity/NRSC IBOC tests.*”² Susquehanna understands and shares Clear Channel’s concern that the AM IBOC signal may affect first adjacent analog listening at the edge of coverage. The potential of first adjacent channel interference that may for the most part occur outside the station’s interference free coverage area is well documented in the iBiquity and NRSC reports and was addressed in Susquehanna’s earlier filing in this proceeding. Nevertheless, Susquehanna believes that an across the board reduction of IBOC power levels during this interim operation is neither necessary nor desirable for the following reasons.

1. Susquehanna believes that with any interim authorization the Commission should condition such operations upon the lack of objectionable interference. Authorizations containing such a provision should alleviate the concerns of Clear Channel, Susquehanna and all AM broadcasters.
2. An across the board reduction of 6 dB will result in a substantial loss of digital coverage for every AM station. This could be extremely detrimental to smaller stations attempting to replicate their analog coverage and overcome man-made interference in their ever-expanding core marketing area.
3. Susquehanna shares the concern raised by Greater Media, Inc. “...*that if the Commission chooses to permit the implementation of AM IBOC during daytime hours, then the transmission parameters must be mandated to match those used in the NRSCs system valuation.*”³ Utilization of these same transmission parameters, will aid iBiquity, the Commission, the NRSC and others as they evaluate stations operating under interim authorization in order to propose final rules to govern this new service

² Comments of Clear Channel Inc. p5

³ Comments of Greater Media, Inc at V

Susquehanna urges the Commission to take the concerns stated above into consideration in any authorization of interim operation of AM IBOC. Susquehanna believes that interim operation is necessary in order for both the AM and FM IBOC systems to be further evaluated and to provide the Commission with real world experience as they develop their final rules for these new services.

Regardless of what action the Commission takes concerning power levels and potential conditional authorizations, Susquehanna urges the Commission to take immediate action and to authorize interim operation so that both AM and FM stations can bring this new service to the American public at the earliest possible date.

Respectfully Submitted,

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